

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ASSUREDPARTNERS OF NEVADA,
LLC,

Plaintiff,

v.

L/P INSURANCE SERVICES, LLC;
DEANNA DEHART; COURTNEY PINO;
CHRISTOPHER “BRYCE” WARNER;
GIGI BRADLEY; and HEATHER PIATT;

Defendants.

Case No. 3:21-cv-00433-RCJ-CLB

**ORDER TO CONTINUE TEMPORARY
RESTRAINING ORDER AND STAY
PENDING SETTLEMENT**

[FIRST REQUEST]

Plaintiff, ASSUREDPARTNERS OF NEVADA, LLC (“Plaintiff”) and Defendants L/P
INSURANCE SERVICES, LLC (“LP”) and DEANNA DEHART, COURTNEY PINO,

1 CHRISTOPHER “BRYCE” WARNER, GIGI BRADLEY, and HEATHER PIATT (“Employee
2 Defendants”) (collectively, “Defendants”), by and through their respective attorneys, hereby
3 stipulate and agree to continue the temporary restraining order (ECF No. 17) (“TRO”) and stay this
4 case pending settlement, as described below.

5 WHEREAS, the parties reached settlement in principle of all claims in this case and are
6 working cooperatively to enter into a written settlement agreement and consent injunction;

7 WHEREAS, the parties agree to stay this case, including all pending case deadlines and the
8 December 20, 2021 preliminary-injunction hearing, pending their forthcoming written settlement
9 agreement and consent injunction; and

10 WHEREAS, the parties agree to continue the TRO pending their forthcoming written
11 settlement agreement and consent injunction.

12 THEREFORE, IT IS HEREBY STIPULATED by and among the parties and ORDERED,
13 as follows:

- 14 1. This case is stayed until further order of the Court.
- 15 2. Defendants’ deadline to respond to Plaintiff’s brief in support of its motion for
16 preliminary injunction (ECF No. 68) and Plaintiff’s motion to file under seal (ECF No. 73) are
17 stayed pending further order of the Court.
- 18 3. The December 20, 2021 preliminary-injunction hearing is vacated.
- 19 4. The December 13, 2021 deadline to submit a joint status report as to live testimony
20 at the preliminary-injunction hearing is vacated. (*See* ECF No. 60.)
- 21 5. The parties shall submit their proposed consent injunction and dismissal papers, or
22 a joint status report, no later than December 14, 2021.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

6. The TRO shall remain in place until further order of the Court.

This stipulation and order is brought in good faith and not for improper purposes or to cause undue delay.

Respectfully submitted,

Dated: December 8, 2021.

LITTLER MENDELSON, P.C.

By: /s/ Z. Kathryn Branson
JAMES M. WITZ
THOMAS W. CARROLL
Z. KATHRYN BRANSON
Attorneys for
L/P INSURANCE SERVICES, LLC

Dated: December 8, 2021.

FISHER & PHILLIPS LLP

By: /s/ Usama E. Kahf
USAMA E. KAHF
DAVID J. WALTON
JEFFREY M. CSERCSEVITS
ALLISON L. KHEEL
ANDREW E. SAXON
Attorneys for Plaintiff
ASSURED PARTNERS OF NEVADA, LLC

Dated: December 8, 2021.

SNELL & WILMER

By: /s/ Paul Swenson Prior
PAUL SWENSON PRIOR
JANINE C. PRUPAS
ALEXIS RENEE WENDL
Attorneys for Individual Defendants
**WARNER, PINO, DEHART,
BRADLEY, and PIATT**

IT IS SO ORDERED.

Dated: 13th day of December, 2021.


UNITED STATES DISTRICT COURT JUDGE